

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF
EMANUEL KATAEV, ESQ. AS TO
SERVICE IN ACCORDANCE
WITH THIS COURT'S ORDER
DATED JUNE 11, 2024**

Emanuel Kataev, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Sage Legal LLC, who – together with Milman Labuda Law Group PLLC – are the attorneys for the Plaintiff IME WatchDog, Inc. (hereinafter “Plaintiff” or “IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. On Wednesday, June 12, 2024, I forwarded a copy of this Court’s June 11, 2024 Order as well as Plaintiff’s letter motion to compel with accompanying exhibit (ECF Docket Entries 345 and 345-1) via email to: (i) Karen Charrington, Esq. (“Charrington”) at **kcharrington@charringtonlawfirm.com**; and (ii) Jonathan Warner, Esq. (“Warner”) at **jdwarner@wslaw.nyc**. A copy of the email is annexed hereto as **Exhibit “A.”**

4. In addition, consistent with the June 11, 2024 Order, I caused non-party Eugene Liddie, Charrington, and Warner to be sent hard copies of the foregoing documents via Federal Express and first-class mail as follows:

- Karren Charrington, Esq., One Cross Island Plaza, Suite 229, Rosedale, NY 11422 via Federal Express tracking number 654530206717;
- Karren Charrington, Esq., 11 Broadway, Suite 615, New York, NY 11422 via Federal Express tracking number 654530206728;
- Eugene Liddie, 329 Brookville Avenue, Islip, NY 11751 via Federal Express tracking number 654530206691; and
- Jonathon Warner, Esq., 6 West 18th Street, 10th Floor, New York, NY 10011 via Federal Express tracking number 654530206706.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 12, 2024.

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.

EXHIBIT A

Emanuel Kataev

From: Emanuel Kataev
Sent: Wednesday, June 12, 2024 5:53 PM
To: kcharrington@charringtonlawfirm.com; Jonathon Warner
Cc: Jamie Felsen
Subject: FW: Activity in Case 1:22-cv-01032-PKC-JRC IME WatchDog, Inc. v. Gelardi et al Order on Motion to Compel
Attachments: 2024-06-11 XXX USDJ Order Granting DE345.pdf; 2024-06-11 345 Ps Letter Motion to Compel.pdf

Counselors:

Please see attached and below, courtesy copies of which are *en route* to you via Federal Express and first-class mail pursuant to the Court's Order.

Regards,

Emanuel Kataev, Esq.
Sage Legal LLC
Emanuel Kataev, Esq., P.C.
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Jamaica, NY 11423-2327
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U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 6/11/2024 at 6:13 PM EDT and filed on 6/11/2024

Case Name: IME WatchDog, Inc. v. Gelardi et al

Case Number: [1:22-cv-01032-PKC-JRC](#)

Filer:

Document Number: No document attached

Docket Text:

ORDER: The Court grants Plaintiff's [345] Motion to Compel. The Court directs both Safa Gelardi and Eugene Liddie to appear at the 6/17/2024 hearing in light of the evidence indicating that they perjured themselves. Plaintiff is directed to serve a copy of this order on Eugene Liddie by overnight and first-class mail. Plaintiff shall file proof of service on the docket by 6/12/2024. Ordered by Judge Pamela K. Chen on 6/11/2024. (HMM)

1:22-cv-01032-PKC-JRC Notice has been electronically mailed to:

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